

Summary of Gatwick's Response to the Night Flight Restrictions at Gatwick, Heathrow and Stansted Consultation

Context

GAL welcomes a simplified and increasingly transparent Night Flight regime that helps to deliver environmental improvements; this is in line with our intent to take account of the feedback we receive through our airspace and noise forums. We also welcome that the consultation aimed to establish realistic measures, and was cast in such a way as to enable fresh data and thinking to inform the evolution of the proposed regime. This is particularly important given the difficulty of predicting the economic environment, post-Brexit, and given the uncertainty associated with airline fleet plans and entry into service of next generation aircraft.

GAL supported the proposed policy objective of encouraging the use of quieter aircraft technology to limit or reduce the number of people significantly affected by aircraft noise at night, while maintaining the significant economic benefits of night flights. This briefing note provides a summary of the GAL consultation response; the full GAL response will be published on our website soon.

While endorsing a number of the consultation proposals GAL believe that the proposed stepped reductions and tapers in Quota Count (QC) limits required further consideration to avoid unintended consequences. The DfT calculations were based on incomplete data and as the current regime already provides a constraint on the number of air traffic movements, the resulting proposals were overly restrictive. Consequently GAL suggested a number of areas that required further consideration.

Specifically with regard to QC restrictions, GAL included data and analysis which provided a more realistic assessment of current and future traffic levels. We suggested that the basis for the reduction in the QC should be that which would apply if all of the flights that are scheduled to take place in the night actually take place in the night and at the time scheduled. Air traffic flow restrictions currently have a material impact on the airlines' ability to fly according to schedule. By revising the QC baseline to reflect what was actually flown in the night period (rather than what was scheduled), the consultation assessment is under-stating Gatwick's planned quota use based on the current schedule.

The consultation also failed to adequately acknowledge the role that market led initiatives, and in particular airport charges, can play. Over the last 18 months, GAL has undertaken a comprehensive review of the structure of its aircraft noise charges and following an extensive period of consultation with its airline customers, we announced a new structure of charges that will take effect from 1 April 2017. This new structure will recognise the wide range of noise performance from aircraft operating at the airport by recognising the ICAO Chapter 14 noise standard. GAL believes that this new charge structure will incentivise the use of quieter aircraft, particularly during the sensitive night period when higher noise charges will apply.

Such an approach is particularly appropriate in the context of the uncertainty that exists with regards to airline fleet plans. While a number of GAL's airline customers have committed to new aircraft orders which are expected to deliver an improvement in noise performance, the timing of deliveries remains uncertain.

Summary of Responses to Proposals

In summary, GAL supported most of the specific proposals, but not those relating to reductions in QC limits. Specifically our response to the consultation is that we:

- Supported the proposal for a 5 year regime.
- Supported the proposal to recognise a new QC/0.125 category.
- Supported the proposal to include all QC/0 aircraft in the movement limit.
 - For GAL this will mean drawing in some existing small business jet flights into the current air traffic movement count which introduces a small reduction to the night air traffic movement count.
- Did not support a 20% reduction in the noise QC limit at Gatwick or further annual reductions in the noise QC limit at the airport over the regime period.
 - The consultation suggested a 20% reduction. However, when taking into account improvements in on time performance, the rate of change in the fleet mix, increase in long haul routes and uncertainty over fleet replacement this would introduce punitive night capacity constraints.
- Proposed a step reduction in the QC limit of 5% in Summer 2017 but with no taper thereafter.
 - We believe that further consideration should be given to the role that airport charges can play in meeting the environmental objective.
- Proposed no change to the Winter QC limit or taper thereafter.